

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : **CHAPTER 7**
NUTRITION CORP, INC. :
Debtor : **CASE NO. 1:24-bk-01672**
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**APPLICATION BY TRUSTEE TO AUTHORIZE KARA K. GENDRON AND
THE LAW FIRM OF MOTT & GENDRON LAW AS ATTORNEY FOR TRUSTEE**

1. On July 9,2024, applicant was appointed as Trustee in the above matter.

2. Applicant wishes to employ Kara K. Gendron and the Law Firm of Mott & Gendron Law as of the date of this application, as an attorney duly admitted to practice in this Court, and makes this application pursuant to Rule 2014, Federal Rules of Bankruptcy Procedure. Applicant has selected Kara K. Gendron and the Law Firm of Mott & Gendron Law for the reason that said law offices have had considerable experience in bankruptcy matters, and applicant believes that said law office is well qualified to represent her in this proceeding. Under Section 327(d) of the Bankruptcy Code, the Trustee may act as attorney for the estate if it is in the best interest of the estate for her to do so.

3. It is necessary that your applicant employ an attorney in connection with this case (a) to recover other assets rightfully belonging to the estate; (b) to document the sale of assets of the estate; and (c) to do all other necessary legal acts as would be required to represent the Trustee in this proceeding.

4. To the best of applicant's knowledge, Kara K. Gendron and the Law Firm of Mott & Gendron Law has no connection with the debtor, creditors, or any other party of interest, and

represents no interest adverse to the Trustee of the estate in matters upon which it is to be engaged, and its employment would be in the best interest of the estate.

5. The normal hourly billing rates of said law firm, at the time of this application, are \$400.00-\$450.00 per hour for partners and \$150.00 per hour for paraprofessionals. It is contemplated that said law firm will seek compensation based upon its normal and usual hourly billing rates, and reimbursement of expenses.

WHEREFORE, applicant prays that she be authorized to retain Kara K. Gendron and the Law Firm of Mott & Gendron Law in this case effective as of the date of this Application, and that she have such other and further relief as is just.

Dated: July 11, 2024

Respectfully submitted,

/s/ Kara K. Gendron
Kara K. Gendron, Trustee
MOTT & GENDRON LAW
125 State Street
Harrisburg, PA 17101
<http://www.mottgendronlaw.com>
T: (717) 232-6650 | F: (717) 232-0477

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AFFIDAVIT OF DISINTEREST
OF KARA K. GENDRON AND THE LAW FIRM OF MOTT & GENDRON LAW

On July 11, 2024, the undersigned, Kara K. Gendron, and the Law Firm of Mott & Gendron Law do affirm that:

1. The affiant proposes to be retained by the Trustee as Attorney for the Estate.
2. There exist no known adverse interest with the Debtors, creditors or other parties in interest of the Estate other than Kara K. Gendron is the appointed Trustee in this case.
3. That affiant has no knowledge or information would render her or the firm unable to perform services to the standards of the profession for the Estate.

I declare under penalty of perjury that the facts contained in the foregoing Affidavit of Disinterest are true and correct to the best of my knowledge, information and belief.

Respectfully submitted,

/s/ Kara K. Gendron
Kara K. Gendron, Trustee
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Harrisburg, PA 17101
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**ORDER APPOINTING KARA K. GENDRON AND
THE LAW FIRM OF MOTT & GENDRON LAW
AS ATTORNEY FOR THE ESTATE**

Upon consideration of a review of the Application filed by the Trustee and it appearing that the Estate will require the services of an Attorney, it is hereby,

ORDERED that Kara K. Gendron, Esquire and the Law Firm of Mott & Gendron Law 125 State Street, Harrisburg, PA 17101, are hereby appointed Attorneys for the Estate.

* Execution of this Order approving employment is not a guarantee that payment will ultimately be approved in any amount from the estate. Such compensation is dependent on the consideration of a final application for fees. *In re Engel*, 124 F.3d 567 (3rd Cir. 1997).

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CERTIFICATE OF SERVICE

I hereby certify that on July 11, 2024, I electronically filed the foregoing with the Clerk of the Bankruptcy Court using the CM/ECF system which sent notification of such filing to the following Filing Users at the following e-mail addresses:

United States Trustee
ustpregion03.ha.ecf@usdoj.gov

Robert Edward Bittner on behalf of Debtor 1 Nutrition Corp, Inc. rbittner@bakerlaw.com

and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants at the following addresses:

None

Dated: July 11, 2024

Respectfully submitted,

/s/ Kara K. Gendron
Kara K. Gendron, Trustee
MOTT & GENDRON LAW
125 State Street
Harrisburg, PA 17101
<http://www.mottgendronlaw.com>
T: (717) 232-6650 | F: (717) 232-0477